

# EXHIBIT 1

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**From:** Blackwood, Emma K.F.  
**Sent:** Thursday, October 3, 2024 3:24 PM  
**To:** Kevin Lavelle <KLavelle@rgrdlaw.com>  
**Cc:** Caprez, Timothy <TCaprez@dykema.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Beidel, Jennifer <JBeidel@dykema.com>  
**Subject:** RE: WANG fourth Rolling Production

Kevin—

The court reporter information for Dr. Wang's SEC testimonies is as follows:

- Volume 1 (August 22, 2023) – Barbara Moore, CRR, RMR, Registered Court Reporter, District of Columbia
- Volume 2 (March 20, 2024) – Jennifer Corb, Court Reporter and Notary Public, Commonwealth of Pennsylvania

I am currently addressing your other requests and anticipate providing responses by this time next week.

Thanks,  
Emma

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**From:** Beidel, Jennifer <[JBeidel@dykema.com](mailto:JBeidel@dykema.com)>  
**Sent:** Thursday, October 3, 2024 2:00 PM  
**To:** Kevin Lavelle <[KLavelle@rgrdlaw.com](mailto:KLavelle@rgrdlaw.com)>  
**Cc:** Blackwood, Emma K.F. <[EBlackwood@dykema.com](mailto:EBlackwood@dykema.com)>; Caprez, Timothy <[TCaprez@dykema.com](mailto:TCaprez@dykema.com)>; Rachel Jensen <[RachelJ@rgrdlaw.com](mailto:RachelJ@rgrdlaw.com)>  
**Subject:** RE: WANG fourth Rolling Production

Emma is working on compiling the responses. She can give you a better timeline on completion than I can. Thanks.

**Jennifer L. Beidel**  
Member

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**From:** Kevin Lavelle <[KLavelle@rgrdlaw.com](mailto:KLavelle@rgrdlaw.com)>

**Sent:** Thursday, October 3, 2024 2:10 PM

**To:** Beidel, Jennifer <[JBeidel@dykema.com](mailto:JBeidel@dykema.com)>

**Cc:** Blackwood, Emma K.F. <[EBlackwood@dykema.com](mailto:EBlackwood@dykema.com)>; Caprez, Timothy <[TCaprez@dykema.com](mailto:TCaprez@dykema.com)>;  
Rachel Jensen <[RachelJ@rgrdlaw.com](mailto:RachelJ@rgrdlaw.com)>

**Subject:** RE: WANG fourth Rolling Production

\*\*\* **EXTERNAL** \*\*\*

Jennifer, as we have not head back from you on my below two emails, please kindly provide a response by close of business tomorrow.

-Kevin

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**From:** Kevin Lavelle

**Sent:** Friday, September 27, 2024 11:49 AM

**To:** 'Beidel, Jennifer' <[JBeidel@dykema.com](mailto:JBeidel@dykema.com)>

**Cc:** 'Blackwood, Emma K.F.' <[EBlackwood@dykema.com](mailto:EBlackwood@dykema.com)>; 'Caprez, Timothy' <[TCaprez@dykema.com](mailto:TCaprez@dykema.com)>; Rachel Jensen <[RachelJ@rgrdlaw.com](mailto:RachelJ@rgrdlaw.com)>

**Subject:** RE: WANG fourth Rolling Production

Jennifer, I am following-up on my email below. Could you kindly advise when the privilege log will be provided, along with the other information requested? As the privilege log contains only a few documents, please produce it as soon as possible, as we would like to get this resolved by a court sooner rather than later.

We saw Dr. Wang's settlement with the SEC yesterday. Could you please explain how Dr. Wang is able to consent to the entry of an SEC order on the same subject matter as his SEC deposition transcripts without admitting or denying the order's findings, but is unable to produce the SEC transcripts without admitting or denying their accuracy?

Relatedly, please also produce the May 14, 2020 email Dr. Wang used to un-blind himself in Cassava's Phase 2b trial, referenced in paragraph 19 of the September 26, 2024 Cease and Desist Order, the spreadsheets referenced in paragraphs 22 and 27 of the order, and the documents reflecting Dr. Wang's ownership of Cassava stock referenced in paragraph 39 of the order. We understood that Dr. Wang produced to Plaintiffs all documents produced to the government, but we have been unable to locate these documents in his production. If we are mistaken, please identify

the Bates number of the document.

-Kevin

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**From:** Kevin Lavelle

**Sent:** Tuesday, September 24, 2024 4:35 PM

**To:** 'Beidel, Jennifer' <[JBeidel@dykema.com](mailto:JBeidel@dykema.com)>

**Cc:** 'Blackwood, Emma K.F.' <[EBlackwood@dykema.com](mailto:EBlackwood@dykema.com)>; 'Caprez, Timothy' <[TCaprez@dykema.com](mailto:TCaprez@dykema.com)>; Rachel Jensen <[RachelJ@rgrdlaw.com](mailto:RachelJ@rgrdlaw.com)>

**Subject:** RE: WANG fourth Rolling Production

Jennifer,

On September 17th, you represented to me that you would provide a copy of Dr. Wang's SEC deposition transcript and exhibits by the end of the week, i.e., by September 20th. As we discussed during our call today, Dr. Wang has now decided to assert his Fifth Amendment rights over the SEC transcript documents based on the Act of Production doctrine and will not be producing them but instead provide a privilege log for those documents. Please provide a date by which that log will be provided.

On the call, we requested authority for the proposition that the production of the SEC transcripts to Plaintiffs would be an admission of the transcripts' accuracy. You were unable to cite any on the call but, if you do find such authority, please let us know and we will consider it before filing any motion to compel.

We further understand that Dr. Wang was represented by counsel at your firm during the SEC depositions, that a court reporter was present, and that Dr. Wang has not reviewed the transcripts for accuracy. Please let us know the name of the court reporter and their agency.

Finally, please confirm, as discussed during the call, that there have been no communications between Dr. Wang, or his counsel, and Defendants, or their counsel, regarding the SEC transcripts. Please also confirm whether or not there are communications more broadly between Dr. Wang's counsel and Defendants' counsel regarding the issues in this case.

Please let us know if anything needs to be clarified.

-Kevin